DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, MID-ATLANTIC
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OPTE3/18
24 FEB 2014

James Harrington, P.E.
Director, Remedial Bureau A
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A, 12th Floor
625 Broadway
Albany, NY 12233-7015

Dear Mr. Harrington,

Subj: NAVAL WEAPONS INDUSTRIAL RESERVE PLANT (NWIRP) BETHPAGE (130003B), OU-2 REMEDY

Thank you for your letter dated January 23, 2014 regarding the performance of work in the southern portion of the western lobe of the Operable Unit (OU) 2 groundwater plumes. The Department of the Navy has secured the necessary funding to address the OU-2 investigation and has retained the United States Geological Survey to assist in modeling groundwater flow and capture in this area.

The Navy continues to implement the strategy identified in the Navy's April 2003 OU-2 Record of Decision (ROD), as well as additional measures identified in the "Study of Alternatives for Management of Impacted Groundwater at Bethpage" (Alternatives Report, January 2012). We believe this is the appropriate approach to addressing the Bethpage plumes in compliance with the remedy described in the Navy's OU-2 ROD. This is the approach to which we are committed.

On September 16, 2013, the Navy participated in a conference call with the New York State Department of Environmental Conservation (NYSDEC), New York State Department of Health (NYSDOH), Nassau County Department of Health, the United States Environmental Protection Agency (USEPA), and Northrop Grumman (NG). During this call, the Navy agreed to install additional vertical profile borings (VPBs) and monitoring wells (MWs) near the onsite containment (ONCT) system, in the southern portion of the western lobe, and upgradient of the Massapequa Water District Well Field.

As you know, the Navy is aggressively conducting groundwater investigations of the OU-2 plumes. To that end, the Navy is currently installing VPBs and monitoring wells in these three primary areas, each of which is integral to refining the site conceptual model and optimizing investigative and remedial efforts. Because the extent and magnitude of this contamination is still undefined, the Navy cannot provide a schedule for all potential future activities that may be required.

In the meantime, it is essential that NG complete its full technical hydraulic assessment of the ONCT System to determine that the system is preventing the off-site movement of volatile organic compound (VOC) impacted groundwater. If the ONCT system is fully containing VOC-contaminated groundwater from the complex, then this means that the mass of VOCs off the former NG and NWIRP properties is limited, and should be addressed by existing and potential future downgradient well head treatment. However, if, as potentially evidenced by the high concentrations of VOCs detected in Bethpage Water District Plant 6, the ONCT System is not fully capturing the VOC-contaminated groundwater, then this means that additional groundwater treatment, (e.g. hot spot treatment), either at the ONCT System or downgradient of the ONCT system, may be required.

Since the September 2013 meeting, the Navy has mobilized a second rig and will shortly be mobilizing a third rig to accelerate delineation of VOCs in groundwater at the three areas. Despite the challenging budgetary times that all federal government agencies are facing, the Navy has greatly increased its commitment of resources to accelerate our understanding of the plume behavior and to optimize remedy implementation.

The investigations in each of the three areas noted above, as performed in accordance with the project work plans, (Uniform Federal Policy Sampling and Analysis Plan (SAP), SAP Addendum, and abbreviated work plans), are part of a comprehensive approach to determining the effectiveness of the current remedy, the need for and feasibility of any additional remedial efforts, and provision of sentinel wells in many parts of the plume, including the southern portion of the western lobe that you mention in your letter. The Navy has provided you a schedule of the VPBs/MWs installations, and in the future, if schedules are impacted (e.g., by weather or by difficulty obtaining access agreements), the Navy will provide you with updates. The new data are being supplied to your office after the results are validated.

The Navy will continue to work with NYSDOH and water districts that have or may be impacted by the plume to implement the strategy as described in the Navy OU-2 ROD and the Alternatives Report (Alternative 2A). In the meantime, in order to ensure timely protection of human health and the environment, the Navy has continued to work with water districts potentially impacted by the OU-2 plumes contaminated with volatile organic compounds that have been migrating, at least in part, from the former Naval Weapons Industrial Reserve Plant (NWIRP). The Navy will continue to look to NG, as a PRP and former owner and operator of both the NWIRP and NG properties, to share this responsibility by engaging in joint settlement discussions with water districts and/or discussions with the Navy.

The Navy and NG continue to meet periodically to discuss the progress made in implementing the joint Navy/NG strategy and to review

newly obtained information. Currently, the Navy is working with NG to provide an updated schedule that outlines the strategy.

The Navy is committed to working with you, and welcomes USEPA's continuing input, towards the mutual goal of ensuring continued safe drinking water in this area. If you have any questions, please contact the Navy's remedial project manager, Lora Fly, at (757) 341-2012.

Sincerely,

Nina Johnson

NINA M. JOHNSON
Northeast IPT
Environmental Business Line
Team Leader
By direction of the
Commanding Officer

Copy to:
NAVAIR, William Cords
NYSDEC, Steven Scharf
USEPA Region II, Carol Stein
Northrop Grumman, Ed Hannon
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